

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
BOSTON DIVISION

CIVIL ACTION NO: 1:19-cv-10717-ADB

PAULO TRINDADE

Plaintiff,

v.

GROVE SERVICES, INC.,  
and VICTOR SPIVAK

Defendants.

**JOINT MOTION TO AMEND SCHEDULING ORDER**

The parties to the above-captioned matter, plaintiff Paulo Trindade and defendants Grove Services, Inc. and Victor Spivak (collectively, the “Parties”) hereby jointly move to amend the Scheduling Order in this case as follows:

1. **Fact Discovery:** Deadline to complete fact discovery, including all non-expert depositions extended from January 17, 2020 to March 6, 2020;
2. **Status Conference:** The status conference scheduled for January 28, 2020 shall be rescheduled to a time convenient for the Court after March 6, 2020.

As grounds for this motion, the Parties state that they have worked diligently and cooperatively to take discovery, including having cooperative meet and confer discussions regarding discovery, and need additional time to complete document discovery before depositions are taken. The parties have also engaged in preliminary settlement discussions, and seek additional time to determine if these discussions will be fruitful during the discovery process. The parties request an extension of the fact-discovery deadline to March 6, 2020, to allow the parties to complete document discovery and depositions.

Respectfully submitted,  
Plaintiff by its attorney,

/s/ David Summer

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Respectfully submitted,  
Defendants by its attorneys,

/s/ Nicholas R. Cassie

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Dated: January 17, 2020